

JUDGE JAMES L. ROBART

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ABU KHALID ABDUL-LATIF,

Defendant.

NO. CR 11-228 JLR

~~(PROPOSED)~~ STIPULATED  
PROTECTIVE ORDER

*Per*

This matter having come before the Court on a Stipulated Motion for Entry of a Protective Order, the Court hereby enters the following:

**PROTECTIVE ORDER**

The personal information provided by the defense in discovery is deemed Protected Material. As used in this Order, the term "personal information" refers to each witnesses' date of birth, Social Security Number (or other identification information), driver's license number, address, telephone number, employment records, military, social services, medical records, mental health records, school records, and includes records from Washington State Department of Social and Health Services, Washington State Child Protective Services, California Department of Health and Human Services and, Washington State Department of Corrections, and other confidential information.

Possession of Protected Material is limited to the prosecution attorneys of record and members of the prosecution team (namely, legal assistants, paralegals, and investigators) as well as the prosecution's experts and consultants (meaning persons that members of the prosecution team need to consult with regarding the meaning of certain records provided by the defense in discovery). The

(PROPOSED) STIPULATED  
PROTECTIVE ORDER

(Abu Khalid Abdul-Latif; CR11-228JLR)

FEDERAL PUBLIC DEFENDER  
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1 prosecution attorneys of record, the members of the prosecution team and the prosecution's experts  
2 and consultants may not share or review the Protected Material in any manner with any other person  
3 and shall keep any Protected Material secured whenever the Protected Material is not being used in  
4 furtherance of their work in the above-captioned case.

5 If the prosecution team provides copies of the protected material to its experts or consultants,  
6 the prosecution team shall ensure that the experts and consultants do not share or review that material  
7 with any other person. The prosecution shall provide a copy of this Order to each of its experts and  
8 consultants who receive copies of the protected material. The prosecution team shall retrieve all  
9 copies of the protected material from its experts and consultants after a verdict has been rendered in  
10 this matter.

11 The parties agree that this Protective Order may be modified, as necessary, by filing with the  
12 Court a Stipulated Order Modifying the Protective Order.

13 DONE this 19<sup>th</sup> day of July, 2012.

14   
15 THE HONORABLE JAMES L. ROBERT  
16 UNITED STATES DISTRICT JUDGE

17 Presented by:

18 /s/ Jennifer E. Wellman  
19 Jennifer E. Wellman, WSBA No. 29193  
20 Assistant Federal Public Defender

21 /s/ Erik B. Levin  
22 Erik B. Levin, WSBA No. 43954  
23 Assistant Federal Public Defender

24 Attorneys for Abu Khalid Abdul-Latif

25 /s/ Todd Greenberg  
26 Asst. United States Attorney  
by e-mail approval

/s/ Michael Dion  
Asst. United States Attorney  
by e-mail approval

Attorneys for United States of America